

EXHIBIT B

From: Esterkin, Richard W. <richard.esterkin@morganlewis.com>
Sent: Monday, February 17, 2020 6:06 PM
To: Jennifer Nassiri
Cc: Fitzpatrick, A. Klair; Diamantatos, Tinos; Eric Winston; Crystal Nix-Hines; Becca Davis; Karen Bobrow; 'JSimon@foley.com'; BNelson@foley.com; amcdow@foley.com
Subject: RE: SCBZ-Follow up from C. Richardson's deposition

[EXTERNAL EMAIL]

Jennifer:

Amazon will not produce the documents that you requested in your February 14 email.

First, I have obtained a copy of the DSP Non-Compliance Enforcement Policy from our client. Upon review, we have determined that it is a confidential attorney client privileged communication. The document was developed by counsel, contains the advice of counsel, describes the role of counsel in various situations, and is labeled on the face of the document as Privileged & Confidential. In addition, it is non-responsive to Hillair's document requests, as limited by Amazon's objections and responses and as discussed in the parties' meet and confer, as it does not relate to routes, assignment of the Amazon contract or the termination of the Amazon contract as it relates to Scoobeez, since Scoobeez was not selected for exit due to a violation of Amazon's compliance policies, but because of its history of wage/hour litigation.

Your request for documents related "to the number an percentage of drivers absorbed in an exit" is uncertain as you do not specify the "exit" or "exits" to which the request refers or the operative date range. It is also irrelevant to the issues raised by Amazon's motion to modify the stay and beyond the scope of Hillair's document requests.

Please feel free to reach out, if you would like to discuss these matters further.

Richard W. Esterkin

Morgan, Lewis & Bockius LLP

300 South Grand Avenue, Twenty-Second Floor | Los Angeles, CA 90071-3132

Direct: +1.213.612.1163 | Main: +1.213.612.2500 | Fax: +1.213.612.2501 | Cell: +1.310.903.2080

Richard.Esterkin@morganlewis.com | www.morganlewis.com

Assistant: Renee Robles | +1.213.612.7321 | Renee.Robles@morganlewis.com

From: Jennifer Nassiri <jennifernassiri@quinnemanuel.com>
Sent: Friday, February 14, 2020 11:36 AM
To: Esterkin, Richard W. <richard.esterkin@morganlewis.com>
Cc: Fitzpatrick, A. Klair <klair.fitzpatrick@morganlewis.com>; Diamantatos, Tinos <tinios.diamantatos@morganlewis.com>; Eric Winston <ericwinston@quinnemanuel.com>; Crystal Nix-Hines <crystalnixhines@quinnemanuel.com>; Becca Davis <beccadavis@quinnemanuel.com>; Karen Bobrow <karenbobrow@quinnemanuel.com>; 'JSimon@foley.com' <JSimon@foley.com>; BNelson@foley.com; amcdow@foley.com
Subject: SCBZ-Follow up from C. Richardson's deposition

[EXTERNAL EMAIL]

Richard,

As a follow up to Ms. Richardson's deposition yesterday, please produce the DSP Non Compliance Enforcement Policy the Transportation Risk & Compliance group developed in 2019 and any drafts of the same. In addition, please produce any and all documents related to the number and percentage of drivers absorbed in an exit. We would like these documents as soon as possible.

Thanks.

Jennifer

Jennifer Nassiri

Quinn Emanuel Urquhart & Sullivan, LLP

865 S. Figueroa Street, 10th Floor

Los Angeles, CA 90017

213.443.3659 Direct

310.418.9536 Mobile

jennifernassiri@quinnemanuel.com

www.quinnemanuel.com

DISCLAIMER

This e-mail message is intended only for the personal use of the recipient(s) named above. This message may be an attorney-client communication and as such privileged and confidential and/or it may include attorney work product. If you are not an intended recipient, you may not review, copy or distribute this message. If you have received this communication in error, please notify us immediately by e-mail and delete the original message.